

## EXHIBIT 34

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF JACKSON

In the Matter of:

HEIDI MARIE BROWN,

Petitioner,

and

ARNAUD PARIS,

Respondent, Pro Per.

Case No. 23CN05721

**MOTION FOR REMOTE  
APPEARANCE AT HEARING TO  
SHOW CAUSE ; AND DECLARATION  
IN SUPPORT BY ARNAUD PARIS, TO  
BE CONSIDERED BY ANOTHER  
JUDGE THAN JUDGE ORR (PER ORS  
14.250)**

I, Arnaud Paris, Respondent Pro Per in the above-captioned case, moves this court for an order allowing Father, respondent, to appear remotely from France for the hearing to show cause and any other hearings in this matter for the following reasons:

1. New developments in the Jackson County state court proceedings happened last week making it impossible for Father to come to the USA anymore. On Friday February 23<sup>rd</sup>, Mother's counsel filed in the Jackson County proceedings an Ex Parte International Arrest Order against Father asking for the participation of the FBI to obtain an extradition of both Father and the children from France. (See attached Exhibit 01). Mother's counsel followed Judge ORR's advice to file such an order as it seems both the court and Miss Brown's counsel are using the Jackson County proceedings in bad

1 faith to harass Respondent to the point of trying to have him arrested in France and his  
2 children taken into custody with the participation of the FBI so that the three of them be  
3 extradited to the US which would deprive Respondent from his parental right in his own  
4 country, granted to him by the Paris court on April 21<sup>st</sup>, 2023 and that was confirmed by  
5 the Paris court again in a second judgment on August 25<sup>th</sup>, 2023, and this would also put  
6 the United States in violation of the Hague Convention of 1980 of which both France and  
7 the USA are signatory.

8       2. I am also physically not able to travel to the United States as this court and  
9 Mother have ensured that my US passport would be revoked by making abusive, illegal  
10 child support orders regarding children that don't live in the United States, they live in  
11 France with Father per a French Judgment that is in full force and effect in Oregon since  
12 it has been registered in Multnomah County under case number 23DR16534 and no  
13 decision has been made by the court to reject it to this date. (~~See attached Exhibit 02~~)

14       3. These abusive illegal child support orders for children who don't even live  
15 in the US have clearly been made by Mother and this court to harass Father and to  
16 prevent him from travelling to the United States since they knew that they would result in  
17 Father's passport being immediately revoked while Father has appealed of these orders  
18 since they are totally illegal, a state court can't make child support orders who children  
19 that live in another country per a custody order registered in another state of Oregon. But  
20 until a court has heard the objections of Father his passport is revoked and he is unable  
21 to travel to the United States since his French Passport is expired and he doesn't have  
22 the financial means to pay the Child Support Order to release his passport while awaiting  
23 a decision from the administrative court.

1           4.     Mother and this court have created a situation in which they are forcing  
2 Father to appear in person at a show cause hearing with potential criminal consequences  
3 while keeping him from travelling to the US since Father doesn't have any other valid  
4 passport currently other than his US passport that has been revoked (his French passport  
5 is expired). This is nothing less than a "setup" to obtain a default contempt order against  
6 Father without due process, which is exactly what this court has been doing against  
7 Father for more than 6 months. The Jackson County court can't participate in this kind of  
8 abusive and bad faith legal strategies from Mother, this court has no other option but to  
9 allow Father to appear remotely in the current situation since Father cannot travel to the  
10 US due to this court's direct actions.

11           5.     I am a French resident living in Paris, and I have been granted custody of  
12 Eva and Juliette Paris, the children I had with Miss Brown, per a French judgement dated  
13 April 21<sup>st</sup> 2023 registered in Oregon in May 9<sup>th</sup> 2023, and improperly and illegally  
14 invalidated by the Jackson County court in August 18<sup>th</sup> 2023, since I wasn't given due  
15 process in these proceedings (I was summarily forbidden to participate while present,  
16 willing and able to appear and participate remotely during these proceedings).

17           6.     The French court in Paris confirmed this first French judgment in August  
18 25<sup>th</sup> 2023 by entering a second judgment reinstating that France did have jurisdiction over  
19 these children and that considering the high risk of Miss Brown taking the children back  
20 to Oregon in violation of the French judgement, her visitation time would have to happen  
21 in France and the children weren't allowed to leave France until further notice.

22           7.     Miss Brown refused to comply with a formal commitment she made through  
23 French lawyers in France in July 2022 to return to France at the end of the 2022-2023

1 school year in Oregon with our children. I am therefore the only parent caring for our  
2 children in France currently and I am unable to attend these proceedings in person in the  
3 Jackson County Court.

4 8. I don't have the financial means to keep going back and forth between  
5 France and the US to attend these proceedings, I also have no residence in the US. The  
6 ongoing litigation that Miss Brown has been extending over me for more than a year in  
7 Oregon while there was already a litigation happening in France for the same children (I  
8 was first to file and first to serve and first to judgment) is now making it simply impossible  
9 for me to face financially these proceedings in person in Oregon while caring for my  
10 children in France per the French judgement that was rejected in the Jackson County  
11 court without due process.

12 9. Miss Brown, her counsel and this court are trying to make another clear  
13 denial of due process in my regards and to impose on me pure and simple "blackmail" to  
14 force me to bring back the children to the US while they are in France under a French  
15 judgment, in the middle of a school year, and there is a restraining order in place to  
16 prevent them from leaving France since Miss Brown made it clear she wouldn't respect  
17 the French judgments or the French judicial system and she is a high risk of kidnapping  
18 the children.

19 10. If Miss Brown truly had a case in this matter when she claims that I  
20 'abducted' the children to France she would logically have started a Hague action in  
21 France which she hasn't. The Jackson County court isn't the appeal court of France; this  
22 court and Miss Brown ought to respect the French judicial system (and the international  
23 principle of Committee) and have to stop making a mockery of it in the Oregon courts.

1 Miss Brown and her counsels lead this court to violate more than half a dozen state and  
2 federal statutes so far in these proceedings and this has turned into a clear personal  
3 vendetta from Miss Brown, her counsel, and the Jackson County court against me.

4 11. This matter was filed, served, decided and adjudicated first in France. This  
5 court violated several of its obligations along the course of these proceedings that could  
6 have avoided this terrible situation. One of them was its obligation to confer with the  
7 French judge before the French determination was made but this court refused to do so  
8 last April while a motion had been filed by Father specifically for that reason.


9 12. If this court had respected its obligation to read and consider my motions  
10 properly filed over the last six months, it would also see clearly that the Oregon court has  
11 no jurisdiction in this matter and this was nothing more than a forum shopping case from  
12 Miss Brown who committed perjury to and manipulated the Jackson County court from  
13 the very beginning in order to escape the French judicial system regarding the custody of  
14 our children.

15 13. Any remedy Miss Brown is seeking regarding custody of the children will  
16 have to happen in France, continuing litigation in front of the Jackson County Court is  
17 made only to harass Father as it has been the case since the beginning since this matter  
18 was to be dealt with in France. Miss Brown and her counsel have to stop making a  
19 mockery of both the Oregon and the French judicial system by ignoring the very reason  
20 the UCCJEA was created for, which is to prevent precisely what Miss Brown and her  
21 counsels have been doing: forum shopping and trying to create a conflicting competing  
22 custodial determination while one has already been made per the UCCJEA standards in  
23 another state.

1           14. Miss Brown's manipulation of the Jackson County Court is unacceptable,  
2 and I need to be allowed to appear remotely at this hearing to show cause after my motion  
3 for reconsideration of Judge Orr to be disqualified has been properly addressed by  
4 another Judge to be given a chance to explain why this contempt is abusive, improper,  
5 illegal, and made in bad faith by Mother. A mistrial or a disqualification of Judge Orr in  
6 this matter are the only solution to stop this mockery of both the Oregon and the French  
7 judicial systems especially as Judge Orr has shown to not be impartial in this matter and  
8 has made improper comments about French people and the French judicial system in  
9 open court and has repeatedly denied me due process in these proceedings. The motion  
10 I filed concurrently to ask for reconsideration of my motion for disqualification of Judge  
11 Orr needs to be addressed first before this motion for remote appearance is to be decided  
12 per ORS 14.250.

13           I hereby declare that the above statement is true to the best of my knowledge  
14 and belief, and that I understand it is made for use as evidence in court and is subject to  
15 penalty for perjury of the laws in the state of Oregon.

16  
17 Prepared on February 29th 2024 in Paris and sent to the court by FEDEX

18  
19  
20   
21 By: ARNAUD PARIS, Respondent, Pro Per  
22 13 rue Ferdinand Duval ,  
23 75004, PARIS, FRANCE  
24 Telephone: +33688283641  
Email: [aparis@sysmicfilms.com](mailto:aparis@sysmicfilms.com)



**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **MOTION FOR REMOTE APPEARANCE AT HEARING TO SHOW CAUSE ; AND DECLARATION IN SUPPORT BY ARNAUD PARIS, TO BE CONSIDERED BY ANOTHER JUDGE THAN JUDGE ORR (PER ORS 14.250)** on the following party:

Heidi Marie Brown  
2256 Abbott Ave  
Ashland, OR 97520  
heidimparis@gmail.com  
Respondent

Taylor L.M. Murdoch,  
Buckley Law P.C.  
5300 Meadows Road, Suite 200  
Lake Oswego, OR 97035  
TLM@buckley-law.com  
Last Known Attorney for Respondent

By the following method or methods:

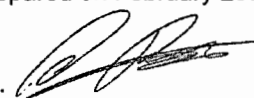
☐ by **mailing** full, true, and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the attorneys(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

☒ by **emailing** full, true, and correct copies thereof to the attorney(s) at the email address shown above, which is the last known email address for the attorney(s) office, on the date set forth below.

☐ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s) shown above, which is the last known fax number for the attorney(s) office, on the date set forth below. The receiving fax machines were operating at the time of service and the transmission was properly completed.

☐ by selecting the individual(s) listed above as a service contact when preparing this electronic filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing system**.

Prepared on February 29th 2024 in Paris and sent to the court by FEDEX

By:   
ARNAUD PARIS, Respondent, Pro Per  
13 rue Ferdinand Duval  
75004, PARIS, FRANCE  
Telephone: +33688283641- Email: aparis@sysmicfilms.com